



PARKER McCAY

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May 29, 2019

Via Electronic Filing

Honorable Karen M. Williams
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Gresko, et al. v. Pemberton Township Board of Education
Docket No.: 1:19-cv-00638-NLH-KMW

Dear Judge Williams:

This firm is counsel to the Pemberton Township Board of Education in the above-referenced matter (hereinafter "District"). Your Honor entered a Scheduling Order on April 5, 2019 setting forth the following dates: telephone status conference set for 6/28/19; pretrial factual discovery due by 6/19/19; dispositive motions due by 7/26/19. The parties have exchange discovery and requests for more specific answers. Plaintiff's counsel has refused to provide several documents to which the District believes it is entitled and are necessary in order to fully and properly litigate this matter.

Therefore, the District respectfully requests that Your Honor enter an Amended Scheduling Order granting a 60-day extension of the date on which discovery is due as well as the date on which dispositive motions are due, and convert the telephone status conference set for 6/28/19 to an in-person conference to discuss these discovery issues in the hopes that they may be resolved without having to resort to motion practice.

I requested the consent of my adversary for this request, and he denied same, stating "Stop your childish demand for instantaneous response and attention. It is not professional or how a member of the bar should act. The answer to your request for extensions of time and to alter Judge Williams' Order is that my client does not consent to unnecessarily delay or increase the costs of this case." Please see the email exchange between myself and Mr. Thurston attached hereto for reference.

COUNSEL WHEN IT MATTERS.SM

Mount Laurel, New Jersey | Hamilton, New Jersey | Atlantic City, New Jersey



PARKER McCAY

Should Your Honor wish to discuss this matter, we are available for a conference call at the Court's convenience.

Respectfully submitted,

s/ Victoria S. Beck

VICTORIA S. BECK

VSb/sc

Cc: Robert C. Thurston, Esquire (via electronic filing)

Victoria Beck

From: Robert C. Thurston, Esq. @SKL <rthurston@schoolkidslawyer.com>
Sent: Wednesday, May 29, 2019 12:16 PM
To: Victoria Beck
Cc: 'cgresko90'
Subject: RE: J.G. v. Pemberton

Ms. Beck:

Your first email was sent on Tuesday, May 28, 2019 at 1:36 pm. Your "2nd attempt" email was sent on Wednesday, May 29, 2019 at 10:58 am. (As documented below.) That is exactly 21 hours and 22 minutes apart (most of which was non-business hours and overnight). Stop your childish demand for instantaneous response and attention. It is not professional or how a member of the bar should act.

The answer to your requests for extensions of time and to alter Judge Williams' Order is that my client does not consent to unnecessarily delay or increase the costs of this case.

You are deemed advised.

Robert C. Thurston, Esq.
~ The SchoolKidsLawyer ~
<http://schoolkidslawyer.com>
856-335-LAW1 (5291)

All prior confidential notices apply hereto.

From: Victoria Beck <vbeck@parkermccay.com>
Sent: Wednesday, May 29, 2019 10:58 AM
To: rthurston@schoolkidslawyer.com
Cc: Samantha Constantine <sconstantine@parkermccay.com>
Subject: RE: J.G. v. Pemberton

Mr. Thurston,

2nd attempt - Do you consent to a 60-day extension of the discovery end date and filing dates for dispositive motions in the above-referenced case? Also, do you consent to converting the June 28th conference call with Judge Williams to an in-person conference?

Please advise.

Victoria Beck

Victoria S. Beck, Esquire
Associate
School Law

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From: Victoria Beck
Sent: Tuesday, May 28, 2019 1:36 PM
To: rthurston@schoolkidslawyer.com
Cc: Samantha Constantine <sconstantine@parkermccay.com>
Subject: J.G. v. Pemberton

Mr. Thurston,

Do you consent to a 60-day extension of the discovery end date and filing dates for dispositive motions in the above-referenced case? Also, do you consent to converting the June 28th conference call with Judge Williams to an in-person conference?

Please advise.

Victoria Beck

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